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9 ALPS PROPERTY & CASUALTY  
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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

13 CENTURY-NATIONAL INSURANCE  
COMPANY, a California corporation,  
14 PACIFIC PIONEER INSURANCE GROUP,  
INC., a Delaware corporation, PACIFIC  
15 PIONEER  
INSURANCE COMPANY, a California  
16 corporation, and UCA GENERAL  
INSURANCE SERVICES, a California  
17 corporation,  
18

19 Plaintiffs,

20 vs.

21 DOUGLAS J. GARDNER, ESQ., an  
individual, DOUGLAS J. GARDNER, LTD., a  
22 Nevada domestic professional corporation,  
RANDS & SOUTH, LTD., a Nevada domestic  
23 professional corporation, ALPS PROPERTY &  
CASUALTY INSURANCE COMPANY, a  
24 Montana corporation, DOES 1 through 20,  
inclusive,  
25

26 Defendants.

**CASE NO.: 2:18-cv-02090-APG-NJK**

**STIPULATION AND ORDER**  
**TO EXTEND TIME TO RESPOND TO**  
**PENDING MOTIONS IN LIMINE**  
**AND MOTION FOR PARTIAL**  
**SUMMARY JUDGMENT**  
**(First Request)**

COMES NOW Defendant, ALPS PROPERTY & CASUALTY INSURANCE COMPANY, (herein referred to as "ALPS"), by and through its counsel of record, JAMES R. OLSON, ESQ., and THOMAS D. DILLARD, JR., ESQ., of the law firm of OLSON CANNON GORMLEY & STOBERSKI, and Plaintiff, CENTURY-NATIONAL INSURANCE COMPANY, PACIFIC PIONEER INSURANCE GROUP, INC., PACIFIC PIONEER INSURANCE COMPANY, and UCA GENERAL INSURANCE SERVICES (herein referred to as "Plaintiffs"), by and through its counsel of record, JAMES P.C. SILVESTRI, ESQ., of the law firm of PYATT & SILVESTRI and JOHN A. MARSHALL, ESQ., of the law firm of MARSHALL & ASSOCIATES and hereby submit this stipulation to extend the current briefing schedule for three responses to motions to be filed with respect to documents #202, #203 & #204 due to conflicting demands imposed from other case deadlines and other previously scheduled matters. It is hereby stipulated to the following procedural history and extensions to the briefing schedule:

WHEREAS Plaintiffs filed their Motion in Limine to Exclude the Expert Report and Testimony of Steven J. Hazel and Memorandum of Points and Authorities on October 13, 2023 [ECF #202]. ALPS's Response thereto is currently due October 27, 2023. ALPS respectfully requests a stipulated one-week extension to respond to that motion on or before Friday, November 3, 2023.

WHEREAS ALPS filed its Renewed Motion *In Limine* Re: Testimonial Evidence in Support of Consequential Damages in Violation of Federal rules of Evidence 701 and 702 [ECF #203] on October 13, 2023. Plaintiffs' Response is also currently due October

27, 2023. It is likewise requested that Plaintiffs' Response thereto be extended from October 27, 2023, to Friday, November 3, 2023.

WHEREAS ALPS filed its Motion for Partial Summary Judgment Re: Expectation Damages and Offset [ECF #204] on October 13, 2023. Plaintiffs' Response to this Rule 56 motion is currently due on November 3, 2023. It is requested this Response to be extended also for ten days to be filed for until Monday, November 13, 2023 (due to the observance of Veteran's Day per Fed.R.Civ.P. 6 (a)(6)(A) on Friday, November 10, 2023).

STIPULATED this 26<sup>th</sup> day of October 2023.

MARSHALL & ASSOCIATES	PYATT & SILVESTRI	OLSON CANNON GORMLEY & STOBERSKI
<i>Isl John Marshall, Esq.</i>	<i>Isl James Silvestri, Esq.</i>	<i>Isl T.D. Dillard, Esq.</i>
John A. Marshall, Esq. California Bar No. 109557 26565 W. Agoura Rd. Ste #200 Calabasas, CA 91302 <i>Attorneys for Plaintiffs</i>	James P.C. Silvestri, Esq. Nevada Bar No. 003603 701 Bridger Avenue Ste #600 Las Vegas, NV 89101 <i>Attorneys for Plaintiffs</i>	James R. Olson, Esq. Nevada Bar No. 000116 Thomas D. Dillard, Jr., Esq. Nevada Bar No. 006270 9950 West Cheyenne Las Vegas, Nevada 89129 <i>Attorneys for ALPS</i>

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**ORDER**

ALPS's Response to Plaintiffs' Motion in Limine [ECF #202] is extended from October 27, 2023 to November 3, 2023;

Plaintiffs' Response to ALPS's Motion in Limine [ECF #203] is extended from October 27, 2023 to November 3, 2023; and

Plaintiffs' Response to ALPS's Motion for Partial Summary Judgment [ECF #204] is extended from November 3, 2023 to November 13, 2023.

IT IS SO ORDERED:

Dated: October 30, 2023

  
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ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE